

Club ERS Radio Communications Study

**Q6. Do you interface with, or work in conjunction with, law enforcement operations?
(Please describe)**

Club #	Description
002	Daily we interface with police agencies. We dispatch ERS trucks for babies locked in car, routine safety, accidents, extreme heat, snow, rain/flood, etc.
009	Routine incident management contacted by state and local police accidents, vehicle and members on highway broken down in harm's way, broken down in major high crime areas
010	Accept telephone service request from the law enforcement community
020	Club provides an 800# to allow law enforcement officials to call in assistance for stranded members.
022	If vehicles are in dangerous situations and it appears to be an AAA member—law enforcement agencies automatically call us.
034	Fleet is available to assist on any emergency (floods, car accidents, etc.)
036	Regularly called by state police for breakdowns and accidents; many local —make our own vehicles available during natural disasters or severe weather.
039	We coordinate activities with state and local police to the extent this is practical
057	Local police agencies will call for assistance with member-related vehicle breakdowns or accidents. County sheriff has AAA dispatch phone number programmed into their dispatch console.
069	Public safety emergencies, incident management
071	Statewide dispatch 800# for police calls
074	New Jersey clubs established a toll-free hotline for state police to report disabled motorists who request AAA. Requires quick response.
080	Report accidents, fires or hazards that are spotted in the field to the proper authorities.
097	Mobile units report and emergencies to the club. In turn we contact the appropriate law enforcement agency. Assistance is offered.
100	MVA's: agencies call us to get AAA service
112	Club manager is on local incident management team and attends all scheduled meetings every two months. ERS Dispatcher or contractor may call special telephone number if some form of traffic control is required at the scene of breakdown.
128	Accidents, stranded motorists (non-members), lockout service, fuel delivery, towing of vehicles
130	Accident towing; severe weather emergencies.
133	Miamisburg train derailment to 1987; 1977-1978 blizzard. Transport of doctors, nurses, fire and emergency personnel.
151	When members are involved in accidents and breakdowns law enforcement agencies call for tow trucks.
160	Patrolmen call our contractors for accidents
179	Dedicate telephone line to Tulsa and Oklahoma City police dept. for member requested emergencies to an officer. They call our dispatcher direct.
178	Local police call us directly to respond to traffic accidents.
188	Accidents, routine ERS
212	Designated police phone line
212	Designated police phone line direct to dispatcher available to all area police departments.
215	All police departments within our servicing area have a hotline number to dispatch for emergencies.

Club ERS Radio Communications Study

Q7. Can you provide examples of how at-will voice or digital access to AAA's voice or digital frequencies would interfere with your ERS dispatch operation?

Club #	Example
002	All Phoenix and Tucson ERS calls are communicated instantly to ERS contractors in a tow truck. 2,000 to 3,000 calls per day would be significantly affected by the interface.
008	Delays in dispatching time, increased safety concerns. With an average of 800 calls per day--major delays will leave accidents, unattended, police calls, traffic blocked, members in dangerous situations.
010	Due to traffic volume during peak period demand, we would not have sufficient air time to dispatch to contractor causing staffing/time delays.
022	The constant radio chatter would cause delays in dispatching necessary service.
034	We could not depend on clear communication to our drivers resulting in untimely or unfulfilled emergency service to the public. (ex: Police call not being able to get truck to scene which needs to lift vehicle or secure vehicle to help save life. Lockout not being done with baby in running car, windows up 85% outside.
038	This would interfere with our ability to quickly respond to emergency situations because of interference from other user on our frequencies.
039	At-will access would interfere with driver and dispatcher ability to communicate when and as needed. The nature of our dispatch operation is so time sensitive that even delays of a second or two would be a disruption.
049	Would interfere with contact between our dispatch center and contractor. Frequencies would be tied up.
057	AAA Emergency dispatch routinely consumes 100% of the airtime on exclusive frequencies...periodically each day. The impact is more significant during extreme weather. Additional users on the frequency could seriously slow response to members and the public--those who are stranded in dangerous locations of weather conditions.
069	With more users on the frequencies it would definitely interrupt our ability to effectively dispatch our ERS calls in a timely manner. Transmissions could be walked-on by other users.
071	Our ability to transmit active ERS calls and/or receive call status updates would be slowed or delayed by busy signals when keying-up the microphone.
074	Busy frequencies will impede our ability to respond to emergency situations in a timely manner (i.e. baby locked in car, disabled vehicles in traffic lanes on busy highways, accidents, etc.
075	Channels will be over used and busy, would not be able to get drivers with information on Emergency road calls. We need those frequencies as does police and fire departments.
080	Create communication delays; hamper timely service delivery
095	Slower response, trouble getting through.
097	Would not allow enough air time to dispatch calls in a timely manner. Delays in response time could jeopardize member's safety and/or create traffic difficulties

111	Our frequencies now at 90% use; it would be hard for anyone else to use. We are now overloading on certain frequencies now.
112	Already experience some interference as we are on a shared repeater. More users in the same frequency would definitely cause problems-especially if we should ever go to full blown radio dispatch.
116	This would greatly hinder our contractors as well as our ability to get our members off an emergency situation (especially critical in extreme weather).
128	Saturating frequencies with non-emergency communications may cost lives when interference causes blockage of airwaves and delays for emergency service equipment.
130	Interference will inhibit the flow of data to emergency service vehicles in responding to disabled motorists on roadways, causing safety issues for motorists and public at large. National road call volumes do indicate a need for special consideration.
133	Could delay help to motorists stranded on interstates—hold up traffic resulting in more accidents, delay in service to emergencies, lockouts.
137	Would delay dispatch time
151	Would inhibit our ability to provide ERS to stranded motorists. During peak times it would make it impossible to direct trucks to these stranded motorists.
164	It would cause mass interference, especially during peak call volume times.
176	I dispatch and track 143,000 emergency calls in Tulsa and Oklahoma City yearly, your example would make this endeavor a nightmare.
178	Having other users on our frequencies would add to the delay in dispatching calls to our contractors.
189	It would shut down our operation completely. The radio frequency would be overloaded and cripple our operation to the extent that our radios would be useless
201	We handle police accident requests for our members, where we need to be able to contact our contractors immediately for immediate response if we are not competing with garbage men, delivery people, plumbers. We will not be able to serve our members and help police clear the accident scene or disabled vehicle which may be in a dangerous situation.
212	Inability to ensure clear access could result in delays of service to stranded members in dangerous situations (i.e. interstates, accidents, breakdowns in unsafe areas).
212	Inability to ensure clear access could result in delays of service to stranded members in dangerous situations (i.e. interstates, accidents, breakdowns in unsafe areas).
215	A shared channel will absolutely not work on our 6 digital channels. Each channel emits a synchronization header each second to send and receive digital messages. Any voice transmission on the channel will corrupt digital communication.
252	Disrupt our communications with contractors.
260	Interference would greatly hinder the efficiency of "on-air" operations in the delivery of more than 160 service calls per day.



Minneapolis

Over 90 Years of Service

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May 2, 1997

Mr. Marshall Doney
American Automobile Association
1000 AAA Drive
Heathrow, FL 32746-5063

RE: FCC Actions Effecting ERS

Dear Mr. Doney:

I have enclosed an article published in the April 1997 edition of *American Townman* . . . it's self-explanatory.

Contractors have provided similar assistance to the public by using their AAA radios to request police and/or fire support for many years.

Examples include:

- * Happening upon an assault, a contractor alerted AAA to call for police while the driver assisted the victim and frightened away the attacker.
- * An AAA driver observed an abduction . . . contacted AAA dispatch and followed the suspect vehicle. The driver, in constant communication with AAA dispatch, relayed the direction of travel while the AAA dispatcher forwarded the information to the police dispatcher. Following nearly 15 minutes of communication the police were able to apprehend the suspect and free the abducted party.
- * AAA drivers have spotted structure/vehicle fires and relayed vital information to fire personnel via AAA dispatch.
- * Accident information is routinely routed to local police agencies . . . identifying personal injury situations and/or hazardous conditions.
- * Road and weather conditions affecting travel (flooding, power lines/trees down, etc.) are relayed to AAA dispatch for dissemination to appropriate agencies/media . . . as conditions/situation dictates.

While these situations may not be unique and/or constant, congested radio frequencies could hamper timely communication and impact the severity of the situation at hand.

Reflecting on normal daily activities, it's not unusual for our existing radio frequencies (approximately 24 radios per frequency) to be congested periodically with routine AAA traffic. Further, AAA traffic tends to be more professional, concise and brief . . . per message. Therefore, shared frequencies would no doubt significantly impact our ability to provide timely emergency response communication.

AAA Minneapolis dispatch is a hot key phone target for dispatch operations of the local sheriff and the Minnesota State Patrol. Vehicle accidents, stalls blocking traffic or in hazardous locations and routine roadside assistance requests, involving AAA members, are routinely relayed to AAA dispatch by law enforcement agencies.

In fact, several AAA contractors have police contracts for towing/extrication, etc. On occasion AAA dispatch relays requests for service for non-member police calls.

I have a real concern about timely radio communications during weather extremes (cold, snow and blizzard conditions). Prompt response is a serious issue when personal safety is at stake!

In general, allowing additional users, let alone non-emergency users, on the auto emergency frequencies would have a significant impact on AAA's ability to promptly respond to those many situations previously described.

Driver fatigue, combined with the frustration of not being able to communicate with dispatch in a timely fashion, could contribute to poor driver attitude . . . impacting member/customer service and possibly even driver morale. Perhaps to some degree even impacting driver and public safety.

Finally, should the auto emergency frequency be made available to other users, the new users would most likely encounter congested airwaves . . . impacting their ability to conduct business.

Frankly, it sounds like a no-win situation for the radio user!

I trust this information will be helpful and supports the position of other AAA clubs.

Cordially,



Ken Mohr, Vice President
Member Services

F1K3

CERTIFICATE OF SERVICE

I, Deborah N. Ng, do hereby certify that a copy of the foregoing Petition for Reconsideration of the American Automobile Association was delivered, by hand, to each of the following, this 19th day of May 1997:

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Federal Communications Commission
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Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
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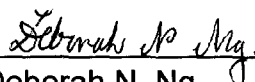
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